Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 3-5, 9, 10, 13, 17, and 18 are pending in the application, with claims 3, 9, 17, and 18 being the independent claims. New claims 17 and 18 are sought to be added. Claims 3, 4, 9, and 13 are sought to be amended. Claims 2, 7, and 14-16 are sought to be canceled without prejudice to or disclaimer of the subject matter therein. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendments and the following remarks, Applicant respectfully requests that the Examiner reconsider all outstanding rejections and that they be withdrawn.

Rejections Under 35 U.S.C. § 103

Knittel in View of Kunimatsu

In the Office Action, at page two, claims 2-5, 7, 9, 10, 13, and 14 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,532,017 to Knittel *et al.* (hereinafter "Knittel") in view of U.S. Patent No. 6,587,110 to Kunimatsu *et al.* (hereinafter "Kunimatsu").

Regarding claims 2, 7, and 14, Applicant has canceled these claims without prejudice to or disclaimer of the subject matter therein.

Regarding claims 3-5, 9, 10, and 13, Applicant respectfully traverses these rejections.

Amended independent claim 3 recites (emphasis added):

> A method for presenting three-dimensional computer graphics images using multiple graphics processing units, comprising the steps of:
>
> (1) allocating three-dimensional computer graphics data to rectangular subvolumes that define a scene such that said allocated three-dimensional computer graphics data corresponds to a portion of the scene that lies within the rectangular subvolumes to which the multiple graphics processing units have been assigned;
>
> (2) rendering, by the multiple graphics processing units, said allocated three-dimensional computer graphics data;
>
> (3) combining said rendered three-dimensional computer graphics data, thereby producing a three-dimensional computer graphics image; and
>
> (4) ***selecting one of presenting a first set of said combined three-dimensional computer graphics data and combining, at a second stage image combiner, the first set of said combined three-dimensional computer graphics data received directly from a first first stage image combiner with a second set of said combined three-dimensional computer graphics data received directly from a second first stage image combiner.***

Amended independent claim 9 recites (emphasis added):

> A system for presenting three-dimensional computer graphics images, comprising:
>
> memory configured to store three-dimensional computer graphics data;
>
> at least one graphics processing unit configured to render a portion of the three-dimensional computer graphics data that corresponds to rectangular subvolumes to which said at least one graphics processing unit is assigned;
>
> a bus configured to communicate a viewing position to each of said at least one graphics processing unit; and
>
> at least one image combiner configured to combine the three-dimensional computer graphics data rendered by said at least one graphics processing unit to produce a three-dimensional computer graphics image;
>
> wherein ***at least two first stage image combiners of said image combiners are configured to be selectively coupled directly to one of an output device and a second stage image combiner of said image combiners.***

Support for these amendments can be found at figure 7 and at paragraph 0039 of the specification of the present patent application.

Neither Knittel nor Kunimatsu, alone or in combination, discloses, teaches, or suggests that ***at least two*** first stage image combiners are configured to be ***selectively*** coupled ***directly*** to one of an output device and a second stage image combiner.

Accordingly, each of independent claims 3 and 9 is patentable over Knittel in view of Kunimatsu. Because each of claims 4, 5, 10, and 13 depends upon claims 3 or 9 and because of the additional distinctive features of each of claims 4, 5, 10, and 13, each of these claims is also patentable over Knittel in view of Kunimatsu. Therefore, Applicant respectfully requests that the Examiner reconsider and remove his rejections of claims 3-5, 9, 10, and 13 under 35 U.S.C. § 103(a) and pass these claims to allowance.

Knittel in View of Kunimatsu in Further View of Kaufman

In the Office Action, at page seven, claims 4, 15, and 16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Knittel in view of Kunimatsu in further view of U.S. Patent No. 5,760,781 to Kaufman *et al.* (hereinafter "Kaufman").

Regarding claims 15 and 16, Applicant has canceled these claims without prejudice to or disclaimer of the subject matter therein, thereby rendering these rejections moot.

Regarding claim 4, Applicant respectfully traverses this rejection. Claim 4 depends upon independent claim 3. As stated above, neither Knittel nor Kunimatsu, alone or in combination, discloses, teaches, or suggests that at least two first stage image combiners are configured to be selectively coupled directly to one of an output device and a second stage image combiner. Kaufman does not overcome this deficiency.

Accordingly, independent claim 3 is patentable over Knittel in view of Kunimatsu in further view Kaufman. Because claim 4 depends upon claim 3 and because of the additional distinctive features of claim 4, this claim is also patentable over Knittel in view of Kunimatsu in further view Kaufman. Therefore, Applicant respectfully requests that the Examiner reconsider and remove his rejection of claim 4 under 35 U.S.C. § 103(a) and pass this claim to allowance.

New Claims

Applicant has added new independent claims 17 and 18. New independent claim 17 recites, *inter alia*:

> selecting one of presenting a first set of said combined three-dimensional computer graphics data and combining, at a second stage combiner, the first set of said combined three-dimensional computer graphics data received directly from a first first stage combiner with a second set of said combined three-dimensional computer graphics data received directly from a second first stage combiner.

Likewise, new independent claim 18 recites, *inter alia*, "wherein at least two first stage combiners of said combiners are configured to be selectively coupled directly to one of an output device and a second stage combiner of said combiners." As stated above, none of Knittel, Kunimatsu, and Kaufman, alone or in combination, discloses, teaches, or suggests that at least two first stage image combiners are configured to be selectively coupled directly to one of an output device and a second stage image combiner. Accordingly, each of new independent claims 17 and 18 is neither anticipated by nor unpatentable over any of Knittel,

Kunimatsu, and Kaufman. Therefore, Applicant respectfully requests that the Examiner pass new independent claims 17 and 18 to allowance.

Conclusion

All of the stated grounds of rejection have been traversed or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicant believes that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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